

1 HON. MARSHA PECHMAN  
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7 **UNITED STATES DISTRICT COURT WESTERN DISTRICT  
OF WASHINGTON AT SEATTLE**

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9 PAUL McTAGGART, )  
Plaintiff )  
10 ) CAUSE NO. C12-1293 MJP  
vs. )  
11 ACE AMERICAN INSURANCE ) DECLARATION OF SHANE CAREW IN  
COMPANY ) SUPPORT OF PLAINTIFF'S PETITION  
12 Defendants ) FOR ASSESSMENT OF REASONABLE  
13 ) ATTORNEYS' FEES  
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I, Shane Carew, declare under penalty of perjury, that the following is true to  
the best of my knowledge and belief:

1. I am over the 18 years of age, and I am competent to testify to the  
matters herein
2. I am a solo practitioner, operating as Shane Carew P.S., d/b/a Carew  
Law Office.

25 **DECLARATION OF SHANE CAREW - 1**

CAREW LAW OFFICE  
5450 California Avenue SW, Suite 101  
SEATTLE, WASHINGTON 98136  
Telephone: (206) 587.0590  
Fax: (206) 587.2388

1       3. Attached hereto as *Exhibit A* is a true and correct copy of my  
2 Curriculum Vitae outlining my relevant education, training and legal experience. My  
3 hourly rate for legal services is \$350.00.

4       4. I was retained to represent Mr. McTaggart in the above-referenced  
5 lawsuit.

6       5. Carew Law Office has incurred a total of \$4,970.00 in fees and has  
7 incurred no costs. Attached hereto as *Exhibit B* is a true and correct copy of the  
8 invoice outlining Carew Law Office's work on this case. As reflected in the attached  
9 invoice, the total number of hours billed were reasonable and necessary in order to  
10 obtain remand.

11      6. I have been practicing maritime law in this community for 32 years. I am  
12 familiar with the hourly rates of attorneys with similar levels of experience and  
13 expertise in maritime matters. The rate of \$350 is at the low end of the range of fees  
14 charged for such services.

16      7. In a case currently pending in King County in which I am involved,  
17 *MWW, PLLC v. Kiribati Seafood Company, LLC*, No. 10-2-18839-8 SEA (King  
18 County), attorneys from three different firms in Seattle with comparable experience to  
19 the undersigned filed declarations that their respective reasonable hourly rates were  
20 \$460 per hour (Lane Powell); \$475 per hour (Dorsey & Whitney), and \$665 per hour  
21 (Perkins Coie).

25 **DECLARATION OF SHANE CAREW - 2**

CAREW LAW OFFICE  
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Fax: (206) 587.2388

I hereby declare under penalty of perjury of the laws of the State of  
Washington that the foregoing is true and correct.

Dated this 17<sup>th</sup> day of October, 2012.

/s/ \_\_\_\_\_  
SHANE C. CAREW, WSBA 10988  
Attorney for Paul McTaggart  
5450 California Ave. SW, Suite 101  
Seattle, Washington 98136  
Telephone: 206-587-0590  
Fax: 206-587-2388  
Email:shane@carewlaw.com

#### CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically served the foregoing document with the Clerk of Court via the CM/ECF system upon all counsel of record on October 17, 2012; as indicated below:

Rodney Fonda  
Cozen O'Connor  
1201 3rd Avenue, Ste. 5200  
Seattle, WA 98101-3071  
Email: [rfonda@cozen.com](mailto:rfonda@cozen.com)

Via CM/ECF

/s/ \_\_\_\_\_  
CAROL HARLOW

#### DECLARATION OF SHANE CAREW - 3

CAREW LAW OFFICE  
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